

Rebecca Cambreleng, OSB No. 133209
rebecca@workplacelawpdx.com
Ashley A. Marton, OSB No. 171584
ashley@workplacelawpdx.com
CAMBRELENG MARTON LLC
3518 S Corbett Avenue
Portland, Oregon 97239
Telephone: (503) 477-4899
Attorney for Gabriella Cato

UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
EUGENE DIVISION

NICHOLAS JAMES MCGUFFIN, as an individual and as guardian *ad litem*, on behalf of S.M., a minor,

Case No. 6:20-CV-01163-MK

Plaintiffs,
v.

MARK DANNELS, PAT DOWNING,
SUSAN HORMANN, MARY KRINGS,
KRIS KARCHER, SHELLY MCINNES,
RAYMOND MCNEELY, KIP OSWALD,
MICHAEL REAVES, JOHN RIDDLE,
SEAN SANBORN, ERIC SCHWENNINGER, RICHARD WALTER,
CHRIS WEBLEY, ANTHONY WETMORE,
KATHY WILCOX, CRAIG ZANNI, DAVID ZAVALA, JOEL D. SHAPIRO AS
ADMISINISTRATOR OF THE ESTATE OF DAVID E. HALL, VIDOCQ SOCIETY,
CITY OF COQUILLE, CITY OF COOS BAY, and COOS COUNTY,

DECLARATION OF REBECCA CAMBRELENG IN SUPPORT OF MOTION TO QUASH SUBPOENA, OR IN THE ALTERNATIVE, MOTION TO GRANT PROTECTIVE ORDER

Defendants.

I, Rebecca Cambreleng, declare under penalty of perjury, the following:

1. I am the attorney for Gabriella Cato in the above-captioned matter. I have personal knowledge of the facts set forth below and make this declaration in support of the Motion to Quash Subpoena, or in the Alternative, Motion to Grant Protective Order, filed herewith.
2. I have conferred with counsel for Plaintiffs, Andrew Lauersdorf, and counsel for Defendants, Robert Franz Jr., regarding this motion. Plaintiffs oppose this motion; Defendants do not oppose this motion.
3. Attached as Exhibit 1 is a true and accurate copy of the Subpoena to Testify at Deposition, which was personally served on Ms. Cato on July 6, 2023.
4. Attached as Exhibit 2 is a true and accurate copy of Ms. Cato's Supplemental First Amended Complaint filed against Fisher Golf Group LLC, and individual defendants, Clackamas County Case No. 22CV07337 ("Retaliation Matter").
5. I represented Ms. Cato in the Retaliation Matter. This case settled in July of 2022. As part of that settlement, Ms. Cato signed a settlement agreement containing the following provision:

"At Plaintiff's request, the Parties agree that the Settlement Payment shall be confidential and, other than for the purpose of enforcing any provision of this Agreement, shall not be disclosed to anyone, except Fisher Golf may disclose the terms of this agreement to employees with a business need to know and the Parties may disclose the terms of this Agreement to their own spouse, attorney, accountant, tax advisor, the Internal Revenue Service, or as otherwise required by law ("Third Parties"), provided the Third Parties to whom such disclosure is made shall agree to be bound by these confidentiality terms."
6. Attached as Exhibit 3 is a true and accurate copy of the transcript of Ms. Cato's deposition, taken on July 6, 2023.
7. On July 6, 2023, Ms. Cato retained my services in relation to the instant lawsuit.

8. Attached as Exhibit 4 is a true and accurate copy of an email sent from Andrew Lauersdorf to myself on July 11, 2023.

9. On July 18, 2023, during a phone conversation between Mr. Lauersdorf and myself, Mr. Lauersdorf stated that he believed Ms. Cato, and by extension myself, had been untruthful in the Retaliation Matter when it came to claims regarding Mr. McGuffin.

I HEREBY DECLARE THAT THE ABOVE STATEMENTS ARE TRUE TO THE BEST OF MY KNOWLEDGE AND BELIEF, AND THAT I UNDERSTAND THEY ARE MADE FOR USE AS EVIDENCE IN COURT AND ARE SUBJECT TO PENALTY FOR PERJURY.

Dated this 20th day of July, 2023.

/s Rebecca Cambreleng

Rebecca Cambreleng, OSB No. 133209
Rebecca@workplacelawpdx.com
CAMBRELENG & MARTON LLC
3518 South Corbett Avenue
Portland, OR 97239
(503) 477-4899

CERTIFICATE OF SERVICE

I certify that on the date listed below, I served the foregoing **DECLARATION OF REBECCA CAMBRELENG IN SUPPORT OF MOTION TO QUASH SUBPOENA, OR IN THE ALTERNATIVE, MOTION TO GRANT PROTECTIVE ORDER** upon the following attorneys and designated recipients for plaintiffs and defendants listed below via electronic means through the Court's Case Management/Electronic Case File system:

Andrew Lauersdorf, OSB No. 980739
acl@mlrlegalteam.com
Janis C. Puracal, OSB No. 132288
jcp@mlrlegalteam.com
Maloney Lauersdorf & Reiner, PC
1111 E. Burnside Street, Suite 300
Portland, Oregon 97214
Attorneys for Plaintiff

David B. Owens, WSBA No. 53856, *pro hac vice*
david@loevy.com
Loevy & Loevy
100 S. King Street, Suite 100
Seattle, Washington 98104-2885
Of Attorneys for Plaintiff

Jesse B. Davis, OSB No. 052290
Jesse.b.davis@doj.state.or.us
Todd Marshall, OSB No. 112685
Todd_marshall@doj.state.or.us
Oregon Department of Justice
100 SW Market Street
Portland, Oregon 97201
Attorneys for Defendants Oregon State Police, John Riddle, Susan Hormann, Mary Krings, Kathy Wilcox

Eric S. DeFreest, OSB No. 920475
edefreest@luvaascobb.com
Luvaas Cobb
777 High Street, Suite 300
Eugene, Oregon 97401
Attorney for Defendant Richard Walter

Robert E. Franz, Jr., OSB No. 730915
rfranz@franzlaw.comcastbiz.net
Sarah R. Henderson, OSB No. 153474
shenderson@franzlaw.comcastbiz.net
Law Office of Robert E. Franz, Jr.
PO Box 62
Springfield, Oregon 97477
Attorneys for Defendants City of Coquille, City of Coos Bay, Coos County, Craig Zanni, Chris Webley, Eric Schwenninger, Sean Sanborn, Ray McNeely, Kris Karcher, Pat Downing, Mark Dannels, Kip Oswald, Michael Reaves, David Zavala, Anthony Wetmore, Shelly McInnes

Anthony R. Scisciani III, OSB No. 070013
ascisciani@hwslawgroup.com
Kelsey L. Shewbert, OSB No. 221063
kshewbert@hwslawgroup.com
Meredith A. Sawyer, OSB No.
msawyer@hwslawgroup.com
HWS Law Group
101 SW Main Street, Suite 1605
Portland, Oregon 97204
Attorneys for Defendant Vidocq Society

DATED July 20, 2023.

CAMBRELENG & MARTON LLC

By: s/ Maxwell Joyner
Max Joyner, Paralegal